

ORIGINAL

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

From: Mr. Jerome K. Hamilton
a.k.a., Cheikh A. Elohim
Pro/Se:
320 East Fifth Street/Apt. 609
Wilmington, Delaware. 19801

Dated: June 25, 2005

TO:

The Honorable Gregory M. Sleet
United States District Court
United States Courthouse
844 King Street/Lockbox 19
Wilmington, Delaware. 19801

FILED
CLERK U.S. DISTRICT COURT
DISTRICT OF DELAWARE
2005 JUN 29 AM 10:56

RE: Hamilton v. Guessford, et al;
Civil Action No. 04-1422-GMS*

Dear Judge Sleet:

I'm writing you this letter on the behalf of plaintiff, concerning additional facts and relevant evidence that should be made apart of the record for future reference's. About Plaintiff, chronic lower back pain which is also affecting plaintiff concentrating and thinking process, because i am on medication like (PERCOCET/7.5-325M).

1. Plaintiff Jerome K. Hamilton/Pro Se, hereby respectfully request this Honorable Court to take judicial notice. That Plaintiff, is requesting this court to allowed plaintiff, to amend his complaint to add the (Department of Corrections), as a defendant did unlawfully imprisonment of the plaintiff four years and sixty-eight days. See:(Attached Exhibit- A). Plaintiff, want and request this court for judicial review of Judge Toliver, decision on May 16, 2003 order the Department of Correction to recalculate the plaintiff release date. See:(Attached Exhibit- A). Plaintiff Hamilton, believe this matter need to be a investigation for factual relvance to their misconduct against the plaintiff.

2. Plaintiff Jerome K. Hamilton/Pro Se, hereby respectfully request this Honorable Court to take judicial notice. That Plaintiff, is requesting this court to allowed plaintiff, to amend his complaint to the or add the (State Of Delaware) as defendant because they had role of taking plaintiff liberty unlawfully imprisonment, by agreeing with the misconduct of Defendant/Guessford, and Defendant/McBride, on March 31, 2000. This next document is relevant to show that (State Of Delaware), did unlawfully imprisonment of plaintiff four years and sixty-eight days. See:(Attached Exhibit-B). Plaintiff, believe this matter need to be a investigation to show their involvement to deprived plaintiff of his libery.

3. Plaintiff Jerome K. Hamilton/Pro Se, want to raised and make a record for future reference, respectfully request this Honorable Court, to take judicial notice and acknowledge the following. Plaintiff had help when compose the complaint and filing on November 5,2004. See:(D.I.2). Because the plaintiff, was experiencing and having difficulty concentrating and his inability to function has affected there thinking by flashbacks, nightmares and mental health medications which started once again on March 1,2004 and on March - 27,2004. The next document are medical records information. See;(Attached - Exhibit- "C").

4. Plaintiff Jerome K. Hamilton/Pro Se, want to raised and make a record for future reference, respectfully request this Honorable Court to take judicial notice and acknowledge the following facts. Plaintiff had help when he compose the filed Request for Default on March 1,2005 See:(D.I.19).The Plaintiff, doesn't have the knowledge or the skills to represent himself, because he is taking mental health medications which is affecting there thinking-medications which started once again on March 27,2004. The next document are a part of plaintiff medical records information. See:(Attached Exhibit- "C").Also Plaintiff, is taking medication because he has chronic lower back pain and the medication their taking are.(Orycod/Apap-Generic For Percocet 7.5-325M). The next document are medical records information from Doctor Jose M. Castro,M.D., See:(Attached Exhibit- "D").

5. Plaintiff Jerome K. Hamilton/Pro Se, want to raised and make apart of the record for future reference, respectfully request this Honorable Court to take judicial notice and acknowledge the following facts. That - plaintiff, need some professional help to handle the above-captioned case because plaintiff have been and still is experiencing chronic lower back pain. And the medication plaintiff is taking are affecting his concentration and thinking are.(Orycod/Apap-Generic For Percocet 7.5-325M). The next document are plaintiff medical records information facts from, Doctor Jose M. Castro,M.D., on the June 24,2005. See:(Attached Exhibit- "D").

6. Plaintiff Jerome K. Hamilton/Pro Se, want to raised and make apart of the record for future reference, respectfully request this Honorable Court to take judicial notice and acknowledge the following facts. Plaintiff doesn't have the knowledge or the skills to compose any type of written-discovery in this case, because plaintiff is taking several type of medication which is affecting his concentration and thinking ability. The medications are plaintiff medical records information provide by Doctor Lifrak,M.D. and Doctor-Castro,M.D.. See:(Attached Exhibit- "C"). And also see the plaintiff, medical-records information document from,Doctor Castro,M.D. See:(Attached Exhibit-D).

7. Plaintiff Jerome K. Hamilton/Pro Se, want to raised and make apart of the record for future reference, respectfully request this Honorable Court to take judicial notice and acknowledge the following facts. Plaintiff can show from record he was on mental health medications on July 16,1999 and the (Department of Corrections), can also prove this fact from there records when plaintiff was incarcerated in prison. Plaintiff can show that his complaints began, about his "difficulty concentrating, flashbacks and nightmares affects did started once again before and on July 16,1999. Plaintiff believe that this fact need a investigation on this matter immediately by the court...

Wherefore, the Plaintiff Jerome K. Hamilton/Pro Se, - hereby respectfully request this Honorable Court to take judicial notice and acknowledge the following facts. That Plaintiff, difficulty concentrating and functioning mentaling and physically because of the medications that plaintiff is taking from. Doctor Lifrak, M.D./and/Doctor Castro, M.D. See: (Attached-Exhibit-"C"). And also. See: (Attached Exhibit-"D"). Now Plaintiff, move this Honorable Court in its discretion should grant plaintiff motion or request - for appointment of trained counsel to represent plaintiff merits claims in the above-captioned case matter who is an indigent civil litigate. See: 28 U.S.C.A. & 1915(e)(1)(West 1998). Also because of the plaintiff mental state-sufficiently disabling him to bring this matter to this court adequately which warrant appointment of counsel according to law under. See: Hamilton v. -Leavy, 117 F.3d 742(3rd Cir.1997). Plaintiff believe he is entitled to this type of relief.

Dated: June 25, 2005

Respectfully Submitted

Plaintiff/Jerome K. Hamilton
a.k.a./Cheikh A. Elohim
Pro Se: *Cheikh A. Elohim*
320 East Fifth Street/Apt. 609
Wilmington, Delaware. 19801

Sworn to and Subscribed before me, this 29 day

of June, 2005.

Alice M. Slaughter